



United States
Environmental Protection
Agency

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Office of Waste & Chemical Management

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Environmental Fact Sheet

Aerosol Can Puncturing Devices

Background: This fact sheet summarizes the use of aerosol can puncturing devices, often referred to as can poppers for the management of spent aerosol cans. Please be aware that this fact sheet addresses only the federal hazardous waste regulations. Authorized State agencies carry out the Resource Conservation and Recovery Act (RCRA) program in their states and State regulations may be more stringent than the federal regulations. Anyone managing aerosol cans should contact the appropriate state environmental agency to find out how the regulations of that particular state will apply to their activities.

Summary:

A common industry practice for the management of spent aerosol cans is to remove any remaining propellant and residual product in a can popper. Waste management practices under EPA hazardous waste rules are outlined below.

1. How are spent aerosol cans regulated and managed under RCRA?

Empty or discarded aerosol cans are considered solid wastes under RCRA. Generators of these wastes must determine whether or not they are hazardous based on the propellant or the contents. Cans that are hazardous must either be sent to an approved treatment, storage, or disposal facility, or be recycled. In general, spent aerosol cans do designate as hazardous waste before being emptied in a can popper. Can poppers are often used as part of a recycling process to remove product and propellant, and to recover scrap metal. Even when cans are not recycled, generators may wish to treat their wastes with a can popper for purposes of volume or toxicity reduction.

2. How do I manage steel cans recovered in a can popper?

Steel cans emptied in a can popper can be either recycled, or disposed of as solid waste. Steel cans properly emptied in a can popper for recycling meet the definition of scrap metal (40 CFR 261.1(c)(6)), and are exempt from Resource Conservation and Recovery Act (RCRA) regulation under 40 CFR 261.6(a)(3)(iv).

If the punctured cans are not to be recycled, they may be managed as non-hazardous waste if they meet the definition of an empty container given

in 40 CFR 261.7. Generally, cans properly emptied and drained in a can popper according to manufacturers instructions will meet the definition of an empty container, as well as the definition of scrap metal. Note that generators have the responsibility of demonstrating that containers are empty according to requirements of 40 CFR 261.7.

3. How are can poppers themselves regulated?

The process of emptying the aerosol cans as part of a recycling process (i.e., scrap steel recycling) is exempt from RCRA regulation under 40 CFR 261.6(c) (except as specified in 40 CFR 261.6(d)). When not a part of a recycling process, can popping may be considered treatment. However, generators may treat their own waste under the generator accumulation standards of 40 CFR 262.34. EPA recommends that aerosol can popping activities be conducted in a safe and environmentally protective manner and that care be taken to properly manage any contents removed from the container (both liquids and gases).

4. How are containers collecting liquids from punctured cans regulated?

Any liquids or contained gases removed from aerosol cans that are captured in a filter or drum may be subject to regulation as hazardous wastes if they are listed in Subpart D of 40 CFR Part 261 or if they exhibit any characteristics of hazardous waste as described in Subpart C of 40 CFR Part 261. Generators are responsible for making these hazardous waste determinations according to the requirements of 40 CFR Part 261 and 262.

The most common type of can popper fits on the top of a 55-gallon drum. In most cases, liquids collected in the drum from the can popper are a hazardous waste (i.e. paint or solvents). As a hazardous waste container, generators may manage the drum either in a less-than-90/180/270 day accumulation area, or as a satellite accumulation area. In either case, the generator must comply with the regulations for managing containers. These regulations are found in 40 CFR 262.34 and 40 CFR 265, Subpart I. Particular care should be taken to prevent mixing of incompatible wastes, as discussed in 40 CFR 264/265.177.

Can poppers in satellite areas must be under the control of an operator, but do not have fixed accumulation times. This option might be best for smaller organizations where only a single person is responsible for managing hazardous waste. 90/180/270-day accumulation areas, on the other hand, are not subject to an operator control requirement, but are subject to additional requirements such as labeling and accumulation time limits. This option might be better for larger organizations with established waste management programs.

For More Information:

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